

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No. 1:25-cv-23182

C.M., et al.,

*Plaintiffs,*

v.

**Kristi Noem**, Secretary of the United States Department of Homeland Security, in her official capacity, et al.,

*Defendants.*

**DECLARATION OF PAUL R. CHAVEZ IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

I, Paul R. Chavez, declare as follows:

1. I am the Litigation Director of Americans for Immigrant Justice (AI Justice) and am counsel for Plaintiffs in this case. I make this declaration to describe my qualifications and those of my colleagues to serve as counsel for the Proposed Class in this case. The following facts are based on my own personal knowledge and, if called as a witness, I could and would testify competently thereto.

**Paul R. Chavez**

2. I am an attorney duly licensed to practice law in the States of Florida and California.

3. In 2005, I graduated from University of California, Berkeley School of Law and received the degree of juris doctor. I became a member of the bar of the State of California in 2006 (now inactive) and the bar of the State of Florida in 2019. I am admitted to practice before the U.S. District Court for the Northern District of California and the Southern District of Florida.

4. I litigate immigration related cases in federal and state courts. I am currently lead

counsel for AI Justice in *Florida Immigrant Coalition, et al. v. James Uthmeier, et al.*, 1:25-cv-21524-KMW (S.D. Fla. filed 2025) (challenging Florida's SB 4-C, which criminalizes certain immigrants for entry and/or re-entry into Florida) and *The Farmworkers Association of Florida, et al. v. Uthmeier, et al.*, No.1:23-cv-22655-RAR (S.D. Fla. filed 2023) (challenging Florida's Senate Bill 1718, Section 10 criminalizing the transportation of certain immigrants into the state).

5. Prior to joining AJ Justice I was a Senior Supervising Attorney at the Southern Poverty Law Center (SPLC), where I practiced exclusively in the organization's Immigrant Justice Project.

6. While at the SPLC, and as relevant here, I was counsel, including lead counsel for SPLC on several immigration related federal cases. See e.g., *Florida Immigrant Coalition, Inc. et. al. v. DeSantis, et. al.* No. 1:22-CV-23927 (S.D. Fla. 2022) (challenging Florida's "alien transportation program", voluntarily dismissed after repeal of challenged section); *Brooks v. Woods*, 5:22-cv-00030-JA-PRL (S.D. Fla. filed 2022) (challenging county's policy of reporting all foreign-born arrests to ICE); *Gayle, et. al. v. Meade, et. al.*, 614 F. Supp. 3d 1175 (S.D. Fla. 2020) (granting motion to certify class for immigration detainees, and motion for preliminary injunction granted in part and denied in part); *Benavides, et. al. v. Gartland, et. al.* No. 5:20-cv-46, 2020 WL 3839938 (2020) (denying motion for preliminary injunction and writ of habeas corpus); *A.P.F., et. al. v. United States*, 492 F. Supp 3d 989 (D. Ariz. Filed 2020) (successfully settled suit that sought compensatory damages for the families, who were targeted by a President Trump administration policy that separated and traumatized thousands of migrant families); *City of S. Miami, et. al. v. DeSantis*, 561 F. Supp. 3d 1211 (S.D. Fla. 2021) (finding sections of Florida state law unconstitutional and granting permanent injunction) (vacated and remanded by *City of S. Miami v. Governor*, 65 F. 4th 631 (11th Cir. 2023)).

7. Prior to my time at SPLC, I served as the Executive Director of Centro Legal de la Raza. Founded in 1969 and headquartered in Oakland California, Centro Legal has provided legal services to the immigrant community for just over 55 years. Under my overall supervision, Centro Legal represented thousands of low-income immigrants each year, with assistance ranging from brief legal services to class action litigation.

8. Previously, I was a Senior Staff Attorney at the Lawyers' Committee for Civil Rights of the San Francisco Bay Area, where I maintained an impact litigation docket primarily representing the low-income immigrant community. I was lead counsel for the Lawyers' Committee in *Abadia-Peixoto v. U.S. Department of Homeland Security*, 277 F.R.D. 572 (N.D. Cal. 2011), a class action certified by the Northern District of California. In this class action, we successfully challenged the unconstitutional shackling of immigrants detained during court proceedings regardless of their history or capacity for disruption. As a result of this success, California Lawyer Magazine recognized myself and co-counsel with their Attorney of the Year Award, for extraordinary achievement in immigrant rights impact litigation.

### **Christy LaRocca**

9. Christina LaRocca is a Litigation Staff Attorney at Americans for Immigrant Justice (AIJ), where she represents immigrants and mixed status families in complex federal litigation and impact-focused advocacy. She is a member of the Florida Bar and is admitted to practice before the U.S. District Court for the Southern District of Florida and the U.S. Court of Appeals for the Eleventh Circuit. Ms. LaRocca graduated from Georgetown University Law Center in 2019 and, shortly thereafter, served as a fellow with the Southern Poverty Law Center's Immigrant Justice Project (SPLC IJP) from 2019 to 2021. After completing her fellowship, she served as a Staff Attorney with the SPLC IJP from 2021 to 2024. She began her current position with AI Justice in August 2024.

10. Ms. LaRocca has, and continues to, serve as counsel in multiple impact litigation matters, including federal class actions and actions seeking institutional reform and community-wide relief. Her work has focused on redressing unlawful government practices that have far-reaching consequences for immigrant communities, including: *Heredia Mons v. McAleenan*, No. 1:19-cv-01593, 2019 WL 4225322, (D.D.C.) (class action challenging ICE's systemic denial of parole to asylum seekers detained in the New Orleans Field Office; resulting in preliminary injunction and settlement negotiations); *City of South Miami v. DeSantis*, No. 1:19-cv-22927 (S.D. Fla.), 408 F. Supp. 3d 1266 (S.D. Fla. 2019) (challenge to Florida's "anti-sanctuary city" law, S.B. 168); *Farmworker Ass'n of Fla. v. Moody*, 734 F. Supp. 3d 1311 (S.D. Fla. 2024) (constitutional challenge to Florida's S.B. 1718, which criminalizes the transportation of undocumented immigrants and restricts access to services); and *Florida Immigrant Coalition, et al, v. James Uthmeier, et al*, 1:25-cv-21524-KMW (S.D. Fla. filed 2025) (challenging Florida's SB 4-C, which criminalizes certain immigrants for entry and/or re-entry into Florida).

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Paul R. Chavez  
Paul R. Chavez

Executed on July 16, 2025.